

STEPHANIE M. HINDS (CABN 154284)  
United States Attorney

THOMAS A. COLTHURST (CABN 99493)  
Chief, Criminal Division

ANKUR SHINGAL (CABN 303434)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7108  
FAX: (415) 436-7234  
Ankur.Shingal@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 21-493-EMC
	)	
Plaintiff,	)	STIPULATION TO CONTINUE STATUS DATE
	)	AND EXCLUDE TIME FROM FEBRUARY 9, 2022
v.	)	TO MARCH 2, 2022, AND <del>[PROPOSED]</del> ORDER
	)	
TIMOTHY MOUTINHO,	)	
	)	
Defendant.	)	

The parties are set for a status hearing in this case on February 9, 2022. However, the parties stipulate and request that the hearing be continued to March 2, 2022 because the defense needs more time to review discovery and consider the government's plea offer.

Further, it is hereby stipulated by and between counsel for the United States and counsel for the defendant Moutinho, that time be excluded under the Speedy Trial Act from February 9 through March 2, 2022 for the same reasons. Therefore, the parties stipulate and agree that excluding time until March 2, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from through March 2, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

1 The undersigned Assistant United States Attorney certifies that he has obtained approval from  
2 counsel for the defendant to file this stipulation and proposed order.

3  
4 IT IS SO STIPULATED.

5 DATED: 2/7/22

/s/  
\_\_\_\_\_  
**ANKUR SHINGAL**  
Assistant United States Attorney

7  
8 DATED: 2/7/22

/s/  
\_\_\_\_\_  
**CANDIS MITCHELL**  
Counsel for Defendant **MOUTINHO**


9  
10 ~~[PROPOSED]~~ ORDER **AS MODIFIED**

11 The Court orders that the the status in this case be continued to March <sup>9</sup>~~2~~, 2022.

12 Further, based upon the facts set forth in the stipulation of the parties and for good cause shown,  
13 the Court finds that failing to exclude the time from February 9, 2022 through March <sup>9</sup>~~2~~, 2022 would  
14 unreasonably deny defense counsel and the defendant the reasonable time necessary for effective  
15 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The  
16 Court further finds that the ends of justice served by excluding the time through March <sup>9</sup>~~2~~, 2022 from  
17 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a  
18 speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time  
19 through March <sup>9</sup>~~2~~, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §  
20 3161(h)(7)(A), (B)(iv).

21 IT IS SO ORDERED. **AS MODIFIED.**

22  
23 DATED: February 8, 2022

  
\_\_\_\_\_  
HON. EDWARD M. CHEN  
United States District Judge